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SECURITIES AND EXCHANGE COMMISSION  
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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; BEASLEY  
LAW GROUP PC; JEFFREY J. JUDD;  
CHRISTOPHER R. HUMPHRIES; J&J  
CONSULTING SERVICES, INC., an Alaska  
Corporation; J&J CONSULTING SERVICES,  
INC., a Nevada Corporation; J AND J  
PURCHASING LLC; SHANE M. JAGER;  
JASON M. JONGEWARD; DENNY  
SEYBERT; ROLAND TANNER; LARRY  
JEFFERY; JASON A. JENNE; SETH  
JOHNSON; CHRISTOPHER M. MADSEN;  
RICHARD R. MADSEN; MARK A.  
MURPHY; CAMERON ROHNER; AND  
WARREN ROSEGREEN;

Defendants; and

THE JUDD IRREVOCABLE TRUST; PAJ  
CONSULTING INC; BJ HOLDINGS LLC;  
STIRLING CONSULTING, L.L.C.; CJ  
INVESTMENTS, LLC; JL2 INVESTMENTS,  
LLC; ROCKING HORSE PROPERTIES,  
LLC; TRIPLE THREAT BASKETBALL,  
LLC; ACAC LLC; ANTHONY MICHAEL  
ALBERTO, JR.; and MONTY CREW LLC;

Relief Defendants.

Case No.: 2:22-cv-00612-CDS-EJY

Judge: Cristina D. Silva

Magistrate Judge: Elayna J. Youchah

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION'S,  
DEFENDANT LARRY JEFFREY'S,  
AND RECEIVER'S STIPULATION  
CONCERNING LIVING EXPENSES**

1       **WHEREAS**, on June 29, 2022, Plaintiff United States Securities and Exchange  
 2 Commission (“SEC”, “Commission”, or “Plaintiff”) filed its Amended Complaint in this matter,  
 3 alleging violations of the registration and/or antifraud provisions of the federal securities laws by  
 4 Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt.  
 5 No. 118.)

6       **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Preliminary  
 7 Injunction Order to extend the existing preliminary injunctive relief and asset freeze to those  
 8 defendants added in the Commission’s Amended Complaint. (Dkt. No. 119.)

9       **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Receivership  
 10 Order to extend the existing receivership order to include those defendants added in the  
 11 Commission’s Amended Complaint. (Dkt. No. 120.)

12       **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Preliminary  
 13 Injunction and Asset Freeze Order, which, *inter alia*, extended the asset freeze imposed by the  
 14 Court on April 13, 2022 to those defendants added in the Commission’s Amended Complaint.  
 15 (Dkt. No. 206.) The Court’s Order provided for “an allowance for necessary and reasonable  
 16 living expenses to be granted only upon good cause shown by application to the Court with  
 17 notice and an opportunity for the Commission to be heard.”

18       **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Receivership Order,  
 19 which, *inter alia*, extended the receivership previously imposed by the Court to the assets of  
 20 those defendants added in the Commission’s Amended Complaint. (Dkt. No. 207.)

21       **WHEREAS**, at the hearing before the Court on July 25, 2022, the Court directed the  
 22 parties to discuss any exceptions to the asset freeze regarding living expenses and so as to ensure  
 23 the scope of the preliminary injunction was tied to the underlying Ponzi scheme.

24       **WHEREAS**, counsel to the Commission, Defendant Larry Jeffrey, and the Receiver have  
 25 reached the following agreement as to an allowance for living expenses, and jointly provide this  
 26 proposed agreement for approval by the Court:

- 27       1.       The Wells Fargo Bank account ending in 8583 (the “Wells Fargo Account”) held  
               in the name of Larry Jeffrey shall be unfrozen to allow Defendant Jeffrey to pay

1 living expenses and hold going-forward, earned income unconnected to the  
2 conduct alleged in the Complaint;

3 2. The Wells Fargo Bank account ending in 1161 (the “Capital Core Financial  
4 Account”) held in the name of Capital Core Financial, Inc. shall be unfrozen to  
5 allow Defendant Jeffrey to hold going-forward, earned income unconnected to the  
6 conduct alleged in the Complaint.

7 3. Defendant Jeffrey may withdraw up to \$3480 per month—representing two times  
8 the IRS 2021 Allowable Living Expenses National Standards for a family of  
9 four—of previously-frozen funds from the Wells Fargo Account until January 31,  
10 2023 for necessary and reasonable living expenses;

11 4. Defendant Jeffrey must provide to counsel to the Commission and to the  
12 Receiver, without further request or subpoena, the monthly account statements of  
13 the Wells Fargo Account and the Capital Core Financial Account for review and  
14 inspection by no later than the 5<sup>th</sup> of each month this stipulation is in effect. The  
15 Wells Fargo Account and the Capital Core Financial Account statements shall be  
16 provided to counsel to the Commission by email to Casey R. Fronk  
17 (fronkc@sec.gov) and Tracy S. Combs (combst@sec.gov); and to the Receiver by  
18 email to Kara Hendricks (hendricks@gtlaw.com) as counsel for the Receiver and  
19 to Geoff Winkler (geoff@americanfiduciaryservices.com).

20 5. To the extent Defendant Jeffrey earns additional, going-forward income that he  
21 demonstrates, to the satisfaction of counsel for the Commission, is unconnected to  
22 the conduct alleged in the Complaint, such income may be used for the payment  
23 of necessary and reasonable living expenses and payment of attorney’s fees and  
24 defense costs. As of the date of this stipulation, this includes the following  
25 sources of income:

- 26 a. Income from the Capital Core Financial mortgage business owned and  
27 controlled by Defendant Jeffrey.

1 Dated: August 10, 2022

**U.S. SECURITIES AND EXCHANGE  
COMMISSION**

2 /s/ Casey R. Fronk

3 TRACY S. COMBS

4 CASEY R. FRONK

5 *Attorneys for Petitioner U.S. Securities and  
Exchange Commission*

6 Dated: August 10, 2022

**ROSS C. GOODMAN**

7 /s/ Ross C. Goodman

8 ROSS C. GOODMAN, ESQ.

9 *Attorney for Defendant Larry Jeffrey*

10 (continued on following page)

1 Dated: August 10, 2022

**GREENBERG TRAURIG, LLP**

2 /s/ Kara B. Hendricks

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19 Suite 2800

20 Los Angeles, California 90017-2543

21 Telephone: (213) 622-5555

22 Facsimile: (213) 620-8816

23 *Attorneys for Receiver Geoff Winkler*

24 IT IS SO ORDERED:

25   
CRISTINA D. SILVA

26 UNITED STATES DISTRICT JUDGE

27 DATED: August 10, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of August, 2022, I caused the foregoing **PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S, DEFENDANT LARRY JEFFREY'S, AND RECEIVER'S STIPULATION CONCERNING LIVING EXPENSES** to be served to all parties entitled to service through the Court's ECF system and to the following individuals by the means indicated below:

*By U.S. Mail, first class, postage prepaid, to:*

BJ Holdings LLC  
c/o Beasley Law Group PC, c/o Matthew Wade Beasley  
Nevada Southern Detention Center  
2190 East Mesquite Avenue  
Pahrump, NV 89060

The Judd Irrevocable Trust  
c/o Trustee Matthew Wade Beasley  
Nevada Southern Detention Center  
2190 East Mesquite Avenue  
Pahrump, NV 89060

Jason M. Jongeward and JL2 Investments, LLC  
[REDACTED]  
Washington, UT [REDACTED]

PAJ Consulting, Inc  
[REDACTED]  
Huntington Beach CA [REDACTED]

Triple Threat Basketball, LLC  
c/o Warren Rosegreen  
[REDACTED]  
Henderson, NV [REDACTED]

The Judd Irrevocable Trust  
c/o Jeffrey Judd  
[REDACTED]  
Henderson, NV [REDACTED]

1 Jason A. Jenne  
[REDACTED]

2 Las Vegas, NV [REDACTED]

3 Warren Rosegreen  
[REDACTED]

4 Henderson, NV [REDACTED]

5  
6 *By email to the following:*

7 Anthony Michael Alberto, Jr. and Monty Crew, LLC  
[REDACTED]

8  
9 Dyke Huish

10 Huish Law Firm

huishlaw@mac.com

*Counsel for Roland Tanner*

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12  
13 /s/ Casey R. Fronk

14 Casey R. Fronk  
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